

THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF NORTH CAROLINA
WINSTON-SALEM DIVISION
FILE No. 1:19-CV-00272-LCB-LPA

MAXWELL KADEL,)
Plaintiff,) APPENDIX TO
v.) MEMORANDUM OF LAW
JASON FLECK, *et al.*,) IN SUPPORT OF
Defendants.) NORTH CAROLINA
) DEPARTMENT OF PUBLIC
) SAFETY'S
) MOTION FOR SUMMARY
) JUDGMENT

NOW COMES Defendant, North Carolina Department of Public Safety (“NCDPS”), by and through undersigned counsel, Special Deputy Attorney General James B. Trachtman, and respectfully submits this Appendix in support of NCDPS’s Motion for Summary Judgment. The appendix only contains those documents which are not already filed with the Motion for Summary Judgment.

1. EXHIBIT 1: Plaintiffs’ Objections and Responses to Defendant Department of Public Safety’s First Set of Interrogatories, First Request for Admissions and First Request for Production of Documents
2. EXHIBIT 2: Deposition of State Health Plan Executive Administrator Dee Jones
3. EXHIBIT 3: Plaintiffs’ First Set of Requests for Production of Documents and Things to Defendant State of North Carolina, Department of Public Safety
4. EXHIBIT 4: Declaration of George Wayne Goodwin

Exhibit A: Expert Disclosure Report of George Wayne Goodwin

5. EXHIBIT 5: Expert Disclosure Report of Jamison Green, Ph.D.
6. EXHIBIT 6: Defendant N.C. Department of Public Safety's Responses to Plaintiffs' First Set of Interrogatories
7. EXHIBIT 7: Copy of *Boyden v. Conlin*, No. 17-cv-264, 2018 U.S. Dist. LEXIS 79753 (W.D. Wis. May 11, 2018) (unpublished order)

Respectfully submitted, this 30th day of November, 2021.

JOSHUA H. STEIN
Attorney General

/s/ James B. Trachtman

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CERTIFICATE OF SERVICE

I hereby certify that on the date indicated above, I electronically filed the foregoing
APPENDIX TO MEMORANDUM OF LAW IN SUPPORT OF NORTH
CAROLINA DEPARTMENT OF PUBLIC SAFETY'S MOTION FOR SUMMARY
JUDGMENT with the Clerk of the Court using the CM/ECF system which will provide
electronic notification to counsel.

DATED: November 30, 2021.

/s/ James B. Trachtman
James B. Trachtman
Special Deputy Attorney General